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Attorneys for Defendant
OKP (CNMI) Corporation

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

DONGBU INSURANCE
COMPANY, LTD.,

Plaintiff,

vs.

OKP (CNMI) CORPORATION,
and JOAQUIN Q. ATALIG,

Defendants.

CIVIL ACTION NO. CV 08-0002

PRE-DISCOVERY DISCLOSURE
STATEMENT OF DEFENDANT OKP
(CNMI) CORPORATION

Case Management Conference

Date: May 2, 2008
Time: 10:00 a.m.
Judge: Hon. Alex R. Munson

Comes now the Defendant OKP (CNMI) Corporation and pursuant to Fed.R.Civ.P. 26(a) and LR 16.2 CJ(d), by and through its attorneys of record, Carlsmith Ball LLP, and hereby files it Pre-Discovery Disclosure Statement.

A. Individuals likely to have discoverable information:

<u>Individual</u>	<u>Subject of Information</u>
Brien Chen	Insurance Policies
Prasada Reddy Joliguir	Instructions on clearing activities
Pramuan Joiphakdee	Equipment Operator

1 B. Description of documents, electronically stored information and tangible things in
2 the possession custody and control of Defendant which may be used to support Defendant's
3 claims or defenses

- 4 1. Correspondence to and from counsel for the parties regarding coverage issues.
5 2. Dongbu Automobile Policy and Contractors All Risk Policy.

6 C. Computation of damages

7 No precise calculation of damages has been made as of this date, but attorney fees and
8 costs in defending the *Atalig v. OKP* claim in Superior Court are in excess of \$500,000.00.
9 Additional damages could include amounts for which OKP may be found liable upon trial of the
10 *Atalig v. OKP* suit in Superior Court.

11 D. Insurance Agreements

12 OKP anticipates Dongbu will provide a complete copy of the policies which are the
13 subject of this Declaratory Judgment proceeding.

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15 CARLSMITH BALL LLP

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17 DATED: Saipan, MP, April 18, 2008.

18 /s/ John D. Osborn
19 JOHN D. OSBORN
20 Attorneys for Defendant
21 OKP (CNMI) CORPORATION
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